



# CAPE COD CRANBERRY GROWERS' ASSOCIATION

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Docket Clerk  
Marketing Order Administration Branch  
Fruit and Vegetable Programs, AMS, USDA  
1400 Independence Ave, SW, Stop 0237  
Washington, DC 20250



To whom it may concern:

I am writing on behalf of the Cape Cod Cranberry Growers' Association (CCCGA) to support the proposed rules published in the April 12, 2004 Federal Register to expand data collection, reporting and record keeping requirements applicable to cranberries not subject to the Cranberry Marketing Order (7CFR Part 929).

The CCCGA represents more than 320 cranberry growers in Southeastern Massachusetts. These growers produce an average of 25 percent of the US cranberry crop. The \$45 million dollar farm gate value of the crop makes the cranberry industry one of the largest production agriculture crops in Massachusetts.

The CCCGA believes that it is imperative that the USDA Cranberry Marketing Committee have the ability to collect cranberry data from all cranberry handlers and importers. Currently the committee is only allowed to collect data from the districts that produce cranberries leaving out an estimated 100-130 companies that are considered secondary handlers or importers of cranberry products.

An oversupply of cranberries has affected the entire industry. The oversupply has resulted in the implementation of a mandatory volume restriction on cranberry producers in the United States by the USDA. The implementation of such a volume restriction is contingent on the Committee's ability to gather accurate and concise information on cranberry inventories from across the country. Public Law 106-78 passed in 1999 authorized the Secretary of the USDA to collect such data, and these proposed rules will allow for the implementation of this law.

The industry cannot have a concise measurement of inventory unless the Committee has the authority to (a) require second-handlers, processors, and brokers to report such acquisitions, dispositions and inventories, and (b) have the authority to audit second-handlers, processors, and brokers.

Expanding the data gathering capability also applies to importers. The Committee is aware that cranberries are being imported. Through the audit process first-handler's records are checked to verify that imports of cranberries are being accurately reported. However, there are second-handlers, processors and brokers who are also importing cranberries that the Committee is not cognizant of because they are not currently required to report such importation.

CCCGA hopes that USDA will expedite the regulations that will allow the Cranberry Marketing Committee to accurately complete its job of tracking cranberry inventories.

Sincerely,

Jeffrey LaFleur  
Executive Director

CC: David Farrimond, CMC  
MA Members CMC